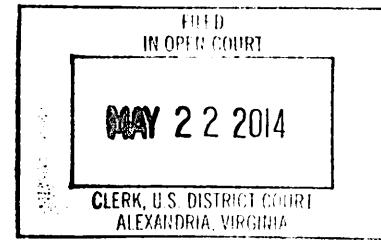


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION



UNITED STATES OF AMERICA)
) Criminal No. 1:14-CR-186
v.)
) Counts 1- 6: 18 U.S.C. § 1343
JULISSA RAUHUT,) (Wire Fraud)
)
Defendant.) Forfeiture Notice
)

INDICTMENT

May 2014 Term – At Alexandria, Virginia

INTRODUCTION

The Grand Jury charges that at all times material:

1. In or about December 2008, J.T., a practicing attorney and partner at a law firm (the “Law Firm”) in Alexandria, Virginia, within the Eastern District of Virginia, hired defendant JULISSA RAUHUT (“RAUHUT”) to work as an officer manager for the Law Firm.
2. J.T. was also the landlord of several properties throughout Northern Virginia.
3. RAUHUT worked for the Law Firm continuously until in or about February 2012.
4. As the office manager, RAUHUT was responsible for coordinating appointments and running the front desk.
5. In addition to her duties as office manager, RAUHUT also oversaw all of J.T.’s billing practices and collected payments from Law Firm clients and rental payments from the tenants of the rental properties that J.T. owned.

6. As part of her duties, RAUHUT was supposed to deposit each payment she received on behalf of J.T. and/or the Law Firm into J.T.'s business bank account.

7. During RAUHUT's employment, from in or about December 2008 until in or about February 2012, J.T. received payments (checks, money orders, or cash) from clients and tenants. All payments were received by either RAUHUT or the front desk clerk who then provided them to RAUHUT.

8. RAUHUT had a personal checking account, number *****8945, at Bank of America, 8096 Rolling Road, Springfield, Virginia 22153, within the Eastern District of Virginia.

9. The above introductory allegations are re-alleged and incorporated in each count of this Indictment as if fully set forth in each count.

COUNTS 1-6
18 U.S.C. § 1343 (Wire Fraud)

The Grand Jury further charges that:

THE SCHEME AND ARTIFICE TO DEFRAUD

10. From in or about May 2009 to in or about February 2012, in the Eastern District of Virginia and elsewhere, the defendant, JULISSA RAUHUT, devised and intended to devise a scheme and artifice to defraud her employer, and to obtain money from her employer, in the amount of approximately \$220,000, by means of materially false and fraudulent pretenses, representations, and promises.

THE MANNER AND MEANS

11. It was part of the scheme and artifice to defraud that RAUHUT took approximately 120 checks and 64 money orders that she had received on behalf of J.T., totaling \$186,178.13.

12. It was further part of the scheme and artifice to defraud that on the back of the checks and money orders intended for J.T. and/or the Law Firm, RAUHUT hand wrote “for deposit only *****8945.”

13. It was further part of the scheme and artifice to defraud that on some of the money orders intended for J.T., RAUHUT handwrote “J. Rauhut” or “Rent – J. Rauhut” on the “pay to the order of” line.

14. It was further part of the scheme and artifice to defraud that RAUHUT took approximately \$36,200 in cash that she had received on behalf of J.T.

15. It was further part of the scheme and artifice to defraud that between in or about May 2009 and in or about February 2012, without J.T.’s knowledge or authorization, RAUHUT

deposited the approximately 120 checks and 64 money orders, which she had received on behalf of J.T., into her Bank of America personal checking account, number *****8945, at the Saratoga Branch located at 8096 Rolling Road, Springfield, Virginia 22153 and other Bank of America branches without J.T.'s knowledge or authorization.

16. It was further part of the scheme and artifice to defraud that between in or about May 2009 and in or about February 2012, without J.T.'s knowledge or authorization, RAUHUT deposited approximately \$36,200.00 in cash, which she had received on behalf of J.T., into her Bank of America personal checking account, number *****8945, at the Saratoga Branch and other Bank of America branches.

USE OF INTERSTATE COMMUNICATIONS

17. On or about the following dates, in Springfield, Virginia and Richmond, Virginia, within the Eastern District of Virginia, RAUHUT, having devised the above-described scheme and for the purpose of executing the scheme, did knowingly cause to be transmitted a writing, signal, and sound by means of a wire and radio communication in interstate commerce; that is, by her transactions at the Saratoga Branch of Bank of America in Springfield, Virginia, she caused interstate wire communications between Bank of America facilities in Richmond, Virginia, and Bank of America facilities in Richardson, Texas, where her transactions were posted to her account.

Count	Date of Deposit	Transaction Details
1	08/17/2009	Check from Alliant, dated 08/06/2009, to the Law Firm, in the amount of \$8,547.15, that had been deposited at Bank of America's Saratoga Branch in Springfield, Virginia into RAUHUT's personal bank account.
2	03/08/2010	Deposit item for \$3500.00 cash that had been deposited at Bank of America's Saratoga Branch in Springfield, Virginia into RAUHUT's personal bank account.
3	08/23/2010	Two MoneyGram Money Orders, dated 08/04/2010, purchased by M.L., a tenant of J.T., in the amounts of \$500.00 and \$75.00, that had been deposited at Bank of America's Saratoga Branch in Springfield, Virginia into RAUHUT's personal bank account.
4	09/16/2010	One United States Postal Service Postal Money Order, dated 08/31/2010, purchased by M.C. and O.C., tenants of J.T., in the amount of \$610.00, that had been deposited at Bank of America's Saratoga Branch in Springfield, Virginia into RAUHUT's personal bank account.
5	07/14/2011	Check from Alliant, dated 07/06/2011, to the Law Firm in the amount of \$3,903.25, that had been deposited at Bank of America's Saratoga Branch in Springfield, Virginia into RAUHUT's personal bank account.
6	08/22/2011	Two Global Express Money Orders, dated 08/01/2011, purchased by M.L., a tenant of J.T., in the amounts of \$500.00 and \$110.00, that had been deposited at Bank of America's Saratoga Branch in Springfield, Virginia into RAUHUT's personal bank account.

(In violation of Title 18, United States Code, Section 1343.)

FORFEITURE NOTICE

18. Pursuant to Federal Rule of Criminal Procedure 32.2(a), RAUHUT is hereby notified that, if convicted of the violations of 18 U.S.C. § 1343 alleged in this Indictment, she shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of such violations, including, but not limited to, a sum of money equal to at least \$222,378.13 in United States currency, representing the amount of proceeds obtained as a result of the charged violations.

19. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by 28 U.S.C. § 2461(c), RAUHUT shall forfeit substitute property, up to the value of \$222,378.13 if, by any act or omission of the defendant, the property directly derived from the charged violations cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

(In accordance with Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.)

A TRUE BILL:

*This document is a Government Act.
The original of this page has been filed
under seal in the Clerk's Office.*

FOREPERSON

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